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23 January 2004

Dominic T. O'Connor PE
Remedial Project Manager Code EV23DO
Naval Facilities Engineering Command
Atlantic Division
1510 Gilbert Street
Norfolk, Virginia 23511-2699

SUBJECT: Allegany Ballistics Laboratory
Work Plan Addendum for Phase IV Investigations
At SWMUs 2 and 27A and Removal Activities at SWMU 37II

Dear Mr. O'Connor:

The West Virginia Department of Environmental Protection/Division of Land Restoration has reviewed the *Draft Work Plan Addendum for Phase IV Investigations At SWMUs 2 and 27A and Removal Activities at SWMU 37II* for the Allegany Ballistics Laboratory Superfund Site Rocket Center, West Virginia and provides the following comments.

1. Page 2-1 second paragraph: There is an extra parenthesis at the end of the second sentence.
2. Page 2-2 second paragraph: The analytical results identified in the paragraph were collected through a procedure that is well known to distort the actual results when compared the permanent monitoring wells. This paragraph should be qualified.
3. Page 2-2; SWMU 2-Former Hazardous Waste Storage Area II; The former hazardous waste storage area was a RCRA subtitle B permitted unit identified in the facilities RCRA permit. This area was not identified as a satellite accumulation area. Further, the reference to SWMU 24 should be clarified. There is a series of SWMU 24 throughout the facility. The current wording implies only one location provided waste to the former hazardous waste storage pad.



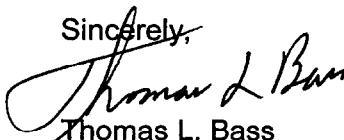
West Virginia Department
of Environmental Protection

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4. Page 2-2; SWMU 2-Former Hazardous Waste Storage Area II: The discussion in the last paragraph is misleading and should be clarified. There has been no documentation provided to date that analytical methods were utilized to verify that the sumps contents were not impacted prior to the release. During historic discussions, it was identified that the stormwater was visually examined prior to release to the ground surface. Please include the historic data or clarify the discussion.

If you have any questions or need additional clarification, please contact me at (304) 558-2508 or Email tbass@wvdep.org.

Sincerely,



Thomas L. Bass
Environmental Resource Specialist
Office of Environmental Remediation
Superfund Group

cc: Donald Martin, WVDEP
Todd Richardson, USEPA
Lou Williams, NAVSEA
John Aubert, NAVSEA